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16 UNITED STATES DISTRICT COURT  
17  
18 NORTHERN DISTRICT OF CALIFORNIA

19  
20 **LUZ VELARDE,**

21 Plaintiff,

22 **v.**

23 **DEPARTMENT OF MOTOR VEHICLES,**  
24 **CARRIE STANTON,**

25 Defendant.  
26  
27  
28

Case No. 18-cv-03749-HSG

**STIPULATION TO CONTINUE  
DEADLINES TO COMPLETE FACT  
AND EXPERT DISCOVERY, AND TO  
HEAR DISPOSITIVE MOTIONS;  
ORDER (as modified)**

Action Filed: June 25, 2018

Plaintiff Luz Velarde (“Plaintiff”) and Defendant Department of Motor Vehicles (“DMV” or “Defendant”), by and through their attorneys of record, jointly stipulate as follows:

1. WHEREAS, the Parties have continued to explore possible resolution of this action following the mediation with mediator Claudia Viera on May 28, 2019.

2. WHEREAS, a central issue in this matter is the amount of service credit Plaintiff has accumulated during her employment with DMV as it affects the type and amount of retirement benefits she is entitled to receive from the California Public Employees’ Retirement System (“CalPERS”) upon retirement.

3. WHEREAS, Plaintiff contends that DMV has improperly caused a decrease in the amount of service credit she has with the DMV, a claim which DMV denies.

4. WHEREAS, the Parties are working together to resolve a potential issue with Plaintiff’s service credit with DMV and this is a critical issue that affects the course of this litigation and possible resolution.

5. WHEREAS, the Parties agree to extend the non-expert and expert discovery deadlines and the dispositive motion hearing deadline by 45 days to allow time for an orderly and efficient review, investigation, and potential resolution of the service credit issue, which may help resolve the case.

6. WHEREAS, pursuant to the Court’s June 12, 2019 Revised Scheduling Order, the Court set the following deadlines:

Event	Date
Close of Fact Discovery	July 15, 2019
Exchange of Opening Expert Reports	July 29, 2019
Exchange of Rebuttal Expert Reports	August 12, 2019
Close of Expert Discovery	August 26, 2019
Dispositive Motion Hearing Deadline	October 3, 2019 at 2:00 p.m.
Pretrial Conference	January 14, 2020 at 3:30 p.m.

7-Day Jury Trial	February 3, 2020 at 8:30 a.m.
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7. WHEREAS, in light of the above, the Parties have agreed to the following continued deadlines:

Event	Date
Close of Fact Discovery	August 29, 2019
Exchange of Opening Expert Reports	September 12, 2019
Exchange of Rebuttal Expert Reports	September 26, 2019
Close of Expert Discovery	October 10, 2019
Dispositive Motion Hearing Deadline	November 18, 2019 at 2:00 p.m. (or the Court's next available date)

**IT IS SO STIPULATED.**

Dated: July 9, 2019

Respectfully Submitted,

XAVIER BECERRA  
Attorney General of California

By: /s/ Jorge Aguilar II

JORGE AGUILAR II  
Deputy Attorney General  
*Attorneys for Defendants Department of  
Motor Vehicles; Carrie Stanton*

Dated: July 9, 2019

ROGERS JOSEPH O'DONNELL

By: /s/ Aaron M. Scolari  
AARON P. SILBERMAN  
AARON M. SCOLARI

Attorneys for Plaintiff  
LUZ VELARDE


**ORDER**

Pursuant to the Stipulation of the Parties and for good cause shown, the Court  
**SETS** the following schedule:

Event	Date
Close of Fact Discovery	August 29, 2019
Exchange of Opening Expert Reports	September 12, 2019
Exchange of Rebuttal Expert Reports	September 26, 2019
Close of Expert Discovery	October 10, 2019
Dispositive Motion Hearing Deadline	November <b>21</b> , 2019 at 2:00 p.m.
Pretrial Conference	January 14, 2020 at 3:00 p.m.
7-Day Jury Trial	February 3, 20120 at 8:30 a.m.

**IT IS SO ORDERED.**

Dated: July 11, 2019

  
HAYWOOD S. GILLIAM, JR.  
United States District Judge